So Ordered.

Dated: September 14th, 2020



frederick P. Corb

Bankruptcy Judge

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25 26 UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WASHINGTON

In Re:

GIGA WATT, INC.,

No. 18-03197-11

STIPULATED ORDER PRESERVING PRIVILEGE PURSUANT TO FRE 502(d)

Debtor.

Based on the stipulation of the parties filed on September 11, 2020 (ECF No. 706), and pursuant to Federal Rule of Evidence 502(d), the Court hereby ORDERS as follows:

Any production of documents and/or provision of information by Perkins Coie LLP in this matter to the Chapter 11 Trustee in the above-captioned case (the "Trustee") or his counsel does not and shall not constitute a waiver of the attorneyclient privilege or any other privilege or protection that applies or may apply to such documents or information, both as to any documents or information produced to the Trustee and as to any other documents or information subject to a claim of privilege in Perkins Coie LLP's possession, whether in this proceeding or in any other federal or

STIPULATED ORDER PRESERVING PRIVILEGE PURSUANT TO FRE 502(d) - 1

BYRNES • KELLER • CROMWELL LLP 38TH FLOOR 1000 SECOND AVENUE SEATTLE, WASHINGTON 98104 (206) 622-2000

1	state proceeding. Perkins Coie LLP may make any such production to the Trustee	
2		
3	pursuant to this Court's "Order Regarding Production of Documents Responsive to	
4	Rule 2004 Order and Placing Limits on the Use of Confidential Information in Such	
5	Documents." ECF No. 673.	
6	IT IS SO ORDERED.	
7	///END OF ORDER///	
8	Proported by	
9	Presented by:	
10	BYRNES KELLER CROMWELL LLP	POTOMAC LAW GROUP
11	By /s/ Bradley S. Keller	By /s/ Pamela M. Egan
12	Bradley S. Keller, WSBA #10665 By /s/ Ralph E. Cromwell, Jr.	Pamela M Egan, WSBA #54736 1905 7th Avenue W.
13	Ralph E. Cromwell, Jr., WSBA #11784	Seattle, Washington 98119
14	1000 Second Avenue, 38th Floor Seattle, Washington 98104	415-297-0132 Email: pegan@potomaclaw.com
15	206-622-2000	Attorneys for Chapter 11 Trustee Mark
16	Fax: 206-622-2522	D. Waldron
17	Email: bkeller@byrneskeller.com rcromwell@byrneskeller.com	
18	Attorneys for Perkins Coie LLP	
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STIPULATED ORDER PRESERVING PRIVILEGE

PURSUANT TO FRE 502(d) - 2

CERTIFICATE OF SERVICE

the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case

who are registered users of the CM/ECF system. The NEF for the foregoing

specifically identifies recipients of electronic notice.

I hereby certify that on this 11th day of September, 2020, I electronically filed

By /s/ Ralph E. Cromwell, Jr.
Ralph E. Cromwell, Jr.
Attorneys for Plaintiffs
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Seattle, Washington 98104
206-622-2000
Fax: 206-622-2522

Email: rcromwell@byrneskeller.com

STIPULATED ORDER PRESERVING PRIVILEGE PURSUANT TO FRE 502(d) - 3

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